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14           **UNITED STATES DISTRICT COURT**

15           **DISTRICT OF NEVADA**

16           TERESA DE JESUS SANTOYO  
17           RODRIGUEZ,

18           Plaintiff,

19           v.

20           OUMID LINA AKBAR; THE TJX  
21           COMPANIES, INC; DOES I-X, inclusive,  
22           and ROE CORPORATIONS I-X, inclusive,

23           Defendants,

24           CASE NO.: 2:23-cv-1520

25           **STIPULATION AND ORDER TO**  
**EXTEND DISCOVERY**

26           **[FIRST REQUEST]**

27           Plaintiff, TERESA DE JESUS SANTOYO RODRIGUEZ, and Defendants, OUMID  
28           LINA AKBAR and THE TJX COMPANIES, INC, hereby stipulate to extend all outstanding  
discovery deadlines set forth in the Stipulated Discovery Plan and Scheduling Order and  
state as follows:

29           a.       This is the first extension sought of the deadlines stated in the Discovery  
30           Plan and Scheduling Order.

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## **Statement of Discovery Completed**

1. Plaintiff's Early Case Conference List of Witnesses and Production of Documents Pursuant to N.R.C.P. 16.1 and supplements;
2. Defendants' Early Case Conference List of Witnesses and Production of Documents and supplements;
3. Plaintiff's Answers to Defendants' First Set of Request for Admissions.
4. Plaintiff's Answers to Defendants' First Set of Request for Production of Documents.
5. Plaintiff's Answers to Defendants' First Set of Interrogatories.
6. Defendants' Answers to Plaintiff's Request for Admissions.
7. Defendants' Responses to Plaintiff's Request for Production of Documents.
8. Defendants' Answers to Plaintiff's Interrogatories.
9. Deposition of Defendant on April 12, 2024.
10. Deposition of Plaintiff on March 24, 2024.

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## **Discovery to Be Completed**

1. Expert Disclosures.
2. Rebuttal Expert Disclosures.
3. Depositions of Plaintiff's Experts.
4. Depositions of Defendants' Experts.

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## **Why Discovery Cannot be Completed in the Time Provided by the Scheduling Order**

Plaintiff has requested prior MRI films to be obtained for the purpose of comparison. The requested films have not yet been received; therefore, an extension is necessary so that the films can be obtained.

**PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY**

- a. A Proposed Joint Pre-Trial Order on this case is Due by October 4, 2024.
- b. The parties, therefore, propose the following extension of the Scheduling Order deadlines, calculated as follows:
  1. The August 2, 2024 discovery cut off will be extended to October 2, 2024;
  2. The May 6, 2024 deadline for filing motions to amend pleadings will be extended to July 8, 2024;
  3. The May 6, 2024 deadline for initial expert disclosures will be extended to July 8, 2024;
  4. The June 4, 2024 deadline for rebuttal expert disclosures will be extended to August 5, 2024;
  5. The September 3, 2024 deadline for filing of dispositive motions will be extended to November 4, 2024;

1           For the foregoing reason, by this stipulation, the parties mutually request this Court  
2 grant the forgoing extension of the Scheduling Order deadlines.

3           Dated this 30<sup>th</sup> day of April, 2024.

4           Dated this 30<sup>th</sup> day of April, 2024.

5           **DE CASTROVERDE LAW GROUP**

6           **WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP**

7           By: s/Millie Mummery

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22          Attorney for Defendants Omid Lina  
23          Akbar & The TJX Companies, Inc.

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5 **ORDER**

6 Upon consideration of the above Stipulation, the discovery deadlines shall be  
7 extended as follows:

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1. Discovery cut off	October 2, 2024;
2. Filing motions to amend pleadings	July 8, 2024;
3. Initial expert disclosures	July 8, 2024;
4. Rebuttal expert disclosures	August 5, 2024;
5. Filing of dispositive motions	November 4, 2024;

A separate Amended Scheduling Order will be issued; the Proposed Joint Pre-Trial Order deadline of October 4, 2024, shall be continued.

**IT IS SO ORDERED.**

DATED this 2nd day of May , 2024.



Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge

Respectfully Submitted by:

**DE CASTROVERDE LAW GROUP**

By: /s/ Millie Mummery

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